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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.622(b),)
Table of Allotments,)
Digital Television Broadcast Stations)
(Macon, Georgia))

MM Docket No. 01-1
RM-10013

To: The Chief, Video Services Division

MOTION TO ACCEPT LATE-FILED OPPOSITION TO
MOTION TO ACCEPT LATE-FILED REPLY COMMENTS
OF GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION

Pursuant to section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, Gannett Georgia, LP ("Gannett"), the licensee of WMAZ-TV, Macon, Georgia, by its attorneys, hereby requests leave to file out of time its Opposition to the Motion to Accept Late-Filed Reply Comments and the Late-Filed Reply Comments of the Georgia Public Telecommunications Commission ("GPTC") in the above-referenced proceeding. Gannett is filing its Opposition concurrently herewith, and has included it as Exhibit 1 to this Motion.

In the Notice of Proposed Rulemaking, the Commission proposed to amend the Table of Allotments for the digital television service ("DTV Table") to change the initial DTV channel allotment for station WMAZ from channel 45 to channel 4 and to delete channel 45 from the DTV table. See Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Macon, Georgia), DA 01-01 (Jan, 5, 2001) ("NPRM"). Two other parties submitted comments in this proceeding.

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The Georgia Public Telecommunications Commission (“GPTC”), licensee of noncommercial educational station WGTV-TV, Athens, Georgia, filed a counterproposal requesting that the Commission change WGTV’s DTV channel allotment to channel 4. Macon Urban Ministries, Inc., d/b/a Good News Television, licensee of WGNM, Channel 64, Macon, Georgia, filed a counterproposal requesting that, should the FCC change WMAZ’s DTV allotment from channel 45 to channel 4, it should not delete channel 45 from the DTV table, but instead change WGNM’s DTV allotment to channel 45. Gannett filed timely reply comments, pointing out fatal deficiencies in GPTC’s counterproposal.

On April 9, 2001, GPTC filed a Motion to Accept Late-Filed Reply Comments, along with its untimely reply comments. As GPTC acknowledges, its reply comments are not contemplated under the Commission’s rules. See NPRM, Appendix; 47 C.F.R. § 1.420. On the date of service, lead counsel for Gannett in this matter was traveling and no other attorney in counsel’s office was served with or had notice of GPTC’s filing until April 18. As a result, a substantial portion of the time allotted to prepare this opposition ran without Gannett having knowledge of the GPTC motion. Upon receiving notice of the filing, counsel promptly contacted Gannett’s consulting engineer. His preliminary review of the revised technical proposal revealed significant deficiencies warranting further study. However, due to prior work commitments and his attendance at the National Association of Broadcasters convention April 23-27, he was unable to thoroughly analyze the proposal and prepare a response until May 4. Under these circumstances, Gannett respectfully submits that good cause exists to permit the filing of its

opposition to GPTC's unauthorized pleading. See, e.g., Brunson Communications, Inc. v. RCN Telecom Services, Inc., 15 FCC Rcd 12883, ¶ 1 n.2 (CSB July 18, 2000).

Respectfully submitted,

GANNETT GEORGIA, L.P.

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Its Attorneys

May 7, 2001

EXHIBIT 1

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.622(b),)	MM Docket No. 01-1
Table of Allotments,)	RM-10013
Digital Television Broadcast Stations)	
(Macon, Georgia))	

To: The Chief, Video Services Division

**OPPOSITION TO MOTION TO ACCEPT LATE-FILED REPLY COMMENTS OF
GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION**

Gannett Georgia, LP (“Gannett”), the licensee of WMAZ-TV, Macon, Georgia, by its attorneys, hereby opposes the Motion to Accept Late-Filed Reply Comments and the Late-Filed Reply Comments of the Georgia Public Telecommunications Commission (“GPTC”) in the above-referenced proceeding. In the Notice of Proposed Rulemaking,¹ the Commission proposed to amend the Table of Allotments for the digital television service (“DTV Table”) to change the initial DTV channel allotment for station WMAZ from channel 45 to channel 4 and to delete channel 45 from the DTV table. Two other parties submitted comments in this proceeding.

The Georgia Public Telecommunications Commission (“GPTC”), licensee of noncommercial educational station WGTW-TV, Athens, Georgia, filed a counterproposal requesting that the Commission change WGTW’s DTV channel allotment to channel 4. Macon Urban Ministries, Inc., d/b/a Good News Television, licensee of WGNM, Channel 64, Macon,

¹ See Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Macon, Georgia), DA 01-01 (Jan, 5, 2001) (“NPRM”).

Georgia, filed a counterproposal requesting that, should the FCC change WMAZ's DTV allotment from channel 45 to channel 4, it should not delete channel 45 from the DTV table, but instead change WGNM's DTV allotment to channel 45. Gannett filed timely reply comments, pointing out fatal deficiencies in GPTC's counterproposal.²

GPTC now seeks leave to file "reply comments" in this proceeding. GPTC's pleading is not contemplated by the Commission's rules, and is instead a belated attempt to salvage its deficient counterproposal by filing an impermissible amendment. See 47 C.F.R. § 1.420. For the reasons set forth below, the Commission should reject GPTC's pleading. Furthermore, as demonstrated herein, even as amended, GPTC's counterproposal fails to comply with the Commission's technical rules. Thus, even if the Commission decides to accept GPTC's late-filed comments and consider the amended counterproposal, it should still reject GPTC's counterproposal and adopt Gannett's proposal to change WMAZ's DTV allotment from channel 45 to channel 4.

II. GPTC's Late-Filed Reply Comments and Counterproposal are Impermissible Under the Commission's Rules and Established FCC Precedent

In its motion and accompanying reply comments, GPTC attempts to characterize its reply comments and amended counterproposal as being necessary to correct errors in the engineering submitted with GPTC's original proposal.³ It is well established, however, that "[c]ounterproposals must be technically correct and substantially complete when filed to afford

² Because the proposal to assign channel 45 to WGNM is contingent on the Commission's assignment of channel 4 to WMAZ, Gannett took no position with respect to the WGNM proposal *per se*.

³ See GPTC Motion at 2-3; GPTC Reply Comments at 5-8.

all parties an opportunity to fully respond in reply comments.”⁴ Moreover, the Commission has stated that “counterproponents are not permitted to file curative amendments.”⁵

GPTC’s attempt to characterize its late submission as being required to correct a technical “error” is equally unavailing. Upon examination, GPTC’s amended counterproposal bears little resemblance to its original proposal. As explained in the attached Engineering Statement of Joseph M. Davis, P.E., the revised counterproposal contains a significantly different antenna pattern and effective radiated power specifications which vary substantially from GPTC’s original proposal. See Attachment 1 at 1-2. In reality, GPTC is attempting to revise its original counterproposal to address each of the valid technical objections raised in Gannett’s reply comments.

This approach is inconsistent with the FCC’s rules, as evidenced by the Commission’s repeated rejection of similar attempts in proceedings regarding the FM Table of Allotments. In one case, for example, a counterproponent attempted to correct deficiencies resulting in short-spacing by filing an amendment and arguing that it was necessary to correct “a typographical

⁴ Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Berling, DeForest, Markesan and Wautoma, Wisconsin), 10 FCC Rcd 7733, ¶ 1 n.2 (Allocations Br., Jul. 19, 1995); see, e.g., Amendment of Section 73.202(b), FM Table of Allotments, FM Broadcast Stations (Susquehanna and Hallstead, Pennsylvania), 2000 FCC LEXIS 6517 (Allocations Br., Dec. 8, 2000); Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Drummond and Victor, Montana), 15 FCC Rcd 19721 (Allocations Br., Oct. 13, 2000); Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Carlisle, Irvine, and Morehead, Kentucky), 12 FCC Rcd 13181 (Allocations Br., Aug. 25, 1997); Amendment of Section 73.202(b), Table of Allotments (Cloverdale, Montgomery and Warrior, Alabama), 12 FCC Rcd 2090 (Policy and Rules Div., Feb. 21, 1997).

⁵ Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Frederiksted and Charlotte Amalie, Virgin Islands), 12 FCC Rcd 2046, ¶ 1 n.3 (Allocations Br., Feb. 21, 1997).

error.”⁶ Noting that the coordinates differed “significantly from those previously submitted in a manner not readily explainable as a typographical error,” the Commission found the amendment unacceptable for filing.⁷ GPTC’s revised proposal likewise differs significantly from its original one – proposing, as it does, a wholly new antenna design, antenna orientation and dramatically increased power – and could hardly be characterized as a correction of a typographical error. In light of settled case law, GPTC’s attempt to amend its counterproposal must be rejected.⁸

GPTC’s dismissive approach and repeated claims that Gannett was wrong in citing errors and deficiencies in GPTC’s technical proposal amount to a classic case of slight of hand. The only thing that makes any of Gannett’s charges “wrong” is that GPTC completely altered its proposal in an attempt to cure the problems that Gannett rightly and justifiably exposed in its Reply Comments. The GPTC counterproposal was defective as filed, cannot be cured by amendment and must be dismissed.

⁶ Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Springdale, Arkansas, Carthage, Aurora and Willard, Missouri), 4 FCC Rcd 674, ¶ 4 n.7 (Policy and Rules Div., Jan. 18, 1989).

⁷ Id.; see also Frederiksted and Charlotte Amalie, Virgin Islands, 12 FCC Rcd 2406, ¶ 1 n.3 (rejecting attempt to amend counterproposal to correct information concerning community of license contained in original filing).

⁸ GPTC’s reliance on other cases in which the Commission has accepted late-filed comments is misplaced. Specifically, none of the cases cited by GPTC involves the acceptance of an amendment or correction to a counterproposal. Moreover, acceptance of GPTC’s unauthorized pleading will do nothing to enhance the FCC’s ability to determine where the public interest lies.

III. GPTC's Amended Counter-Proposal Still Fails to Satisfy Applicable Technical Criteria and Should be Rejected

As the attached Engineering Statement demonstrates, even GPTC's *amended* counterproposal continues to suffer from several major defects, any one of which would warrant rejection of the proposed change in WGTV's DTV allocation to channel 4. See Attachment 1. As amended, the counterproposal will still cause interference to an existing NTSC station beyond the FCC's *de minimis* limit, in violation of section 73.623(c) of the Commission's rules. See 47 C.F.R. § 73.623(c); Attachment 1 at 2-3; id. at Table 1. In addition, even considering GPTC's "corrected" engineering submission and significantly increased power, the proposal fails to provide the required level of principal community coverage, due to incoming interference from other broadcast signals. See id. at 4; id. at Figure 1. Specifically, the proposed operation of WGTV on channel 4 would only provide interference-free coverage to 53.8 percent of the area and 56.9 percent of the population of Athens, and thus fails to comply with section 73.625(a) of the Commission's rules. See 47 C.F.R. § 73.625(a); Attachment 1 at 4; id. at Figure 1. Moreover, as explained in the Engineering Statement, the proposed antenna pattern and protection of other stations may not be possible to maintain, due to the extreme null (amounting to total suppression at 40 degrees True) in the antenna design. See Attachment 1 at 4-5. Finally, GPTC's amended counterproposal contains inconsistent field data, making it impossible to determine the exact specifications of the proposed directional antenna system. See id. at 5.

Thus, even as amended, GPTC's counterproposal must be rejected. As explained in Gannett's reply comments, GPTC's current DTV allotment is technically superior for WGTV in that it permits WGTV to meet the Commission's *de minimis* interference limits, replicate its analog signal in Athens and meet the Commission's increased principal community signal

strength requirements, while its proposal for channel 4, even taking into consideration its late-filed amendment, does not. Accordingly, there is no basis to change WGTV's DTV allotment to channel 4.

IV. Gannett's Proposal Satisfies All Applicable Technical Criteria and Provides Superior Public Interest Benefits

As demonstrated in Gannett's reply comments in this proceeding, Gannett's proposal to change WMAZ's DTV allotment to channel 4 satisfies all technical criteria and provides superior public interest benefits.⁹ Gannett's proposal fully complies with the Commission's technical rules regarding duplication of its analog signal and the FCC's increased signal strength requirements. It will increase the percentage of persons residing in rural and underserved areas who are able to receive the station's signal, and through its partnership with iBlast, will improve the provision of high-speed broadband service to customers.¹⁰ Moreover, Gannett's proposal provides substantial public service benefits by allowing it to improve and expand its already high level of service to its community of license and the surrounding areas.¹¹

As demonstrated above, GPTC's amended counterproposal still suffers from technical defects that will inhibit WGTV's ability to serve its community of license. Any purported

⁹ See Gannett Reply Comments at 7-12.

¹⁰ GPTC takes issue with Gannett's "touting" of its participation in iBlast. In particular, GPTC attempts to create an inconsistency between Gannett's mention of its ability to provide broadband service *in addition to* meeting the FCC's DTV service requirements while at the same time emphasizing that any increase in GPTC's ability to provide broadband service comes *at the expense of* compliance with the Commission's requirements for DTV service. Gannett simply wishes to clarify that because the provision of free, over-the air broadcast television remains the FCC's primary goal, GPTC's ability to provide auxiliary services using its DTV spectrum must be given secondary weight in this proceeding.

¹¹ See Gannett Reply Comments at 7-12.

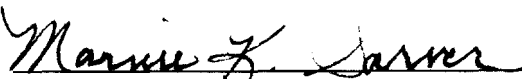
benefits derived from changing WGTV's DTV allotment to channel 4 will therefore come at the expense of providing the required level of service to its community of license. Accordingly, Gannett's proposal to allocate WMAZ's DTV allotment to channel 4 should be granted as supplying superior public interest benefits.

V. Conclusion

As demonstrated above, the Commission's rules and established precedent require that GPTC's motion be denied and its late-filed reply comments and amended counterproposal dismissed. Should the Commission reach the merits of GPTC's belated filing, Gannett submits and has demonstrated herein that, even as amended, GPTC's proposal fails to satisfy the FCC's technical criteria for DTV stations and must be rejected.

Respectfully submitted,

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Its Attorneys

May 7, 2001

ATTACHMENT 1

ENGINEERING STATEMENT

prepared for

Gannett Georgia, L.P.

WMAZ-DT Macon, Georgia

MM Docket 01-1

This engineering statement has been prepared on behalf of *Gannett Georgia, L.P.* ("*Gannett*"), in support of its opposition to the amended counterproposal of *Georgia Public Telecommunications Commission* ("*GPTC*") in a Notice of Proposed Rulemaking, Mass Media Docket 01-1.¹ The subject docket proposes to change the paired digital television (DTV) assignment for WMAZ-TV (NTSC Channel 13, Macon, GA) from DTV Channel 45 to DTV Channel 4, as requested by *Gannett*.

In its comments filed in Docket 01-1, *GPTC*, licensee of WGTV(TV) (NTSC Channel 8, Athens, GA), provided a counterproposal. Following *Gannett's* Reply Comments responding to the *GPTC* counterproposal, *GPTC* provided late-filed reply comments that revised its counterproposal. In *GPTC's* original and revised counterproposals, WGTV-DT would be assigned DTV Channel 4 in lieu of its present Channel 22 allotment. The original and revised counterproposals are mutually exclusive with *Gannett's* use of DTV Channel 4 at Macon, GA.

GPTC asserts that its original counterproposal contained an "error" which is corrected in its revised counterproposal. However, the revised counterproposal contains a significantly different antenna pattern and effective radiated power (ERP) specifications which vary considerably from their original proposal. A wholesale change was thus offered, not a simple "error" correction. Further, as with its original counterproposal, the *GPTC* revised counterproposal also does not comply with §73.623(c) of the Commission's Rules regarding DTV channel changes, in that the *GPTC* proposal would cause interference to an existing NTSC station in excess of the Commission's *de minimis* limit. Additionally, the *GPTC* revised counterproposal would not provide interference-free service to a substantial portion of Athens, WGTV's principal community. It is also noted that the theoretical directional antenna system specified in the revised counterproposal has an impractical amount of suppression which cannot be achieved in the field. Finally, *GPTC* has supplied inconsistent relative field data for the directional antenna system

¹See Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Macon, Georgia), MM Docket No. 01-1, RM 10013, released January 5, 2001.

ENGINEERING STATEMENT

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Discussion - Revised Counterproposal “Error” Correction

GPTC states that an error was made in its original counterproposal, which led to deficiencies in its meeting the Commission’s principal community coverage requirements and *de minimis* interference protection. However, *GPTC* never specifically states the nature of the “error” (*i.e.*, a misplaced decimal point or transposed numeric digits). Examination of the revised counterproposal shows that *GPTC* has increased the maximum ERP from 3 kW to 17 kW and specified a wholly different directional antenna pattern. (See *GPTC*’s engineering exhibit 4 in the original and revised counterproposals to compare the directional antenna patterns.) These changes in the counterproposal are substantial, and are beyond any reasonable concept of merely correcting a typographical or other minor error.

The original *GPTC* counterproposal simply did not comply with the Commission’s requirements regarding principal community coverage and *de minimis* interference protection, which was clearly and accurately pointed out by the undersigned in an engineering statement accompanying *Gannett*’s Reply Comments. In its revised counterproposal, *GPTC* has made substantial changes to its original counterproposal, and claims that *Gannett*’s Reply Comments were incorrect. However, *Gannett*’s Reply Comments were indeed correct with respect to the original counterproposal. Subsequently, now *GPTC* has provided a revised counterproposal and attempts to suggest that the conclusions reached in *Gannett*’s Reply Comments were incorrect, inasmuch as *GPTC* believes its revised counterproposal cures the deficiencies pointed out by *Gannett*. However, as described in the following, the revised counterproposal also suffers from deficiencies.

Revised Counterproposal Does Not Meet Commission’s Interference Criteria

DTV channel change requests are subject to meeting interference protection criteria with respect to other full-power NTSC and DTV stations and allotments. Per §73.623(c)(2) of the Commission’s Rules, a channel change proposal cannot exceed the Commission’s 2% / 10% *de minimis* interference limits to such stations. Accordingly, detailed interference studies were conducted by the undersigned regarding the revised counterproposal in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission’s Office of

ENGINEERING STATEMENT

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Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69").²

The results showed that the *GPTC* revised counterproposal causes 2.1 percent new interference to the population served by WYFF(TV), Greenville, SC (NTSC Ch. 4, 202.5 km distant). "Before" consideration of the *GPTC* revised counterproposal, the population subject to interference from DTV stations within the WYFF service area is zero. "After" the *GPTC* counterproposal is considered, the population subject to interference from DTV stations within the WYFF service area is 45,960. This is 2.1 percent of the WYFF noise-limited contour population of 2,196,954. The attached **Table 1** provides the detailed interference study result to WYFF. Thus, the Commission's 2 percent *de minimis* limit regarding new interference to WYFF is exceeded, and the counterproposal does not meet the requirements of §73.623(c)(2).

GPTC's engineering analysis states that the new interference to WYFF as a result of the counterproposal would be 1.95 percent (just under the 2 percent *de minimis* limit). *GPTC*'s engineering stated that the analysis was performed using V-Soft Communications "Probe II" software package, running on a PC platform. The undersigned is familiar with that software package, and has found that the results using that program are often at a slight variance from the FCC's analysis program results. These variances are typically due to minor differences in computer platform rounding and precision. The FCC's policy heretofore has been to consider its own analysis program to be controlling. The results reported herein were produced by the FCC's current DTV analysis program, running on an Alpha processor, and are believed to reflect the exact results that the FCC's analysis would provide. As shown, the interference to WYFF from the *GPTC* revised counterproposal as calculated by the undersigned exceed the Commission's *de minimis* limit.

²The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was used. Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

ENGINEERING STATEMENT

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Revised Counterproposal's Coverage of Principal Community

As with the original counterproposal, reception of the *GPTC* revised counterproposal facility in WGTW-DT's principal community of Athens and the surrounding area will be subject to a considerable amount of incoming interference. The attached **Figure 1** depicts the predicted coverage and incoming interference, based on OET-69. As demonstrated thereon, a significant part of the east-northeastern service area of the Channel 4 revised counterproposal would be affected by interference. Specifically, the OET-69 analysis showed that only 53.8 percent of the area and 56.9 percent of the population of Athens could enjoy interference-free reception of the revised counterproposal facility (*i.e.*, only 23.2 square km of Athens' 43.1 square km are covered, and only 26,019 of Athens' 45,736 population is covered).

Most of the interference would be caused by existing co-channel NTSC station WYFF. The original *GPTC* counterproposal also suffered from this same defect. The WYFF Grade B contour location is also provided on **Figure 1**. As shown, it passes very near Athens. The close proximity of the WYFF Grade B contour to Athens corresponds to the predictions of the large areas of predicted interference to the *GPTC* revised counterproposal facility.

Proposed Antenna System Is Impractical

In order to reduce interference to WYFF, *GPTC's* revised counterproposal relies on a theoretical directional pattern having a very deep minimum value. In *GPTC's* engineering exhibit 9, the minimum relative field of 0.001 is specified for 40°T. This is a suppression level of 60 dB. A practical antenna system cannot be constructed to provide such a great suppression level over the entire 6 MHz digital television channel bandwidth. Reputable antenna manufacturers have advised that a suppression of approximately 30 dB is the maximum that may be realized in practice. Since the actual suppression cannot achieve 60 dB, and the 60 dB suppression is intended by *GPTC* to reduce new DTV interference to WYFF, an actual antenna would cause even more interference to WYFF than is predicted to occur using this unrealistic antenna pattern.

ENGINEERING STATEMENT

(page 5 of 6)

Nevertheless, should the *GPTC* revised counterproposal be adopted, the Commission should require actual antenna measured data to be supplied upon construction that demonstrates compliance with the 60 dB specification, as the suppression is intended to provide interference protection.

Finally, in *GPTC*'s revised counterproposal's engineering exhibit 5 ("Tabulation of Azimuth Pattern"), the directional antenna's relative field at 40°T is listed as 0.000. A relative field value of 0.000 implies that there will be no radiation along this bearing, and the suppression would be infinite. This is even more improbable and impractical than the 60 dB suppression mentioned above. Further, this differs from the value of 0.001 referenced above in *GPTC*'s engineering exhibit 9. Thus, on the basis of the exhibits provided by *GPTC*, it is impossible to determine the exact specifications of the directional antenna system. Perhaps the inconsistent data is another "error" in *GPTC*'s counterproposal.

Summary

GPTC's revised counterproposal should not be favorably entertained in that it does not comply with the Commission's interference criteria of §73.623(c)(2). Additionally, incoming interference from WYFF will significantly impair reception of the revised counterproposal facility within its principal community. Further, the directional antenna system as specified is impractical, and there is ambiguity in the antenna's exact specifications.

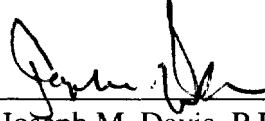
Certification

Under the penalty of perjury, the undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief. Mr. Davis is a principal in the firm of *Cavell, Mertz & Davis, Inc.*, is a Registered Professional Engineer in Virginia, holds a Bachelor of Science degree from Old Dominion University in Electrical Engineering Technology, and has submitted numerous

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engineering exhibits to various local governmental authorities and the Federal Communications Commission. His qualifications are a matter of record with that entity.



Joseph M. Davis, P.E.

May 3, 2001

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10300 Eaton Place Suite 200
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(703) 591-0110

List of Attachments:

Table 1	Interference Analysis Results for Revised Counterproposal
Figure 1	<i>GPTC</i> Revised Counterproposal OET Bulletin 69 Predicted Coverage and Interference

Table 1
INTERFERENCE ANALYSIS RESULTS FOR REVISED COUNTERPROPOSAL
 prepared for
Gannett Georgia, L.P.
WMAZ-DT Macon, Georgia
MM Docket 01-1

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 04-29-2001 Time: 15:24:09

Record Selected for Analysis

WGTV-DT USERRECORD-01 ATHENS GA US
 Channel 04 ERP 17. kW HAAT 304 m RCAMSL 00581 m
 Latitude 033-48-18 Longitude 0084-08-40
 Status APP Zone Border
 Dir Antenna Make usr Model WGTV_DT_01 Beam tilt N Ref Azimuth 000.0
 Last update Cutoff date Docket
 Comments
 Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
04	WYFF	GREENVILLE SC	BLCT	-2363

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
03	WBTV	CHARLOTTE NC	131.7	LIC	BLCT	-19980227KI
04	WCIQ	MOUNT CHEAHA AL	345.3	APP	BPRM	-20000328ABC
04	WMAZ-TV	MACON GA	276.5	APP	BPRM	-20000328ABQ
04	WDKY-DT	DANVILLE KY	332.5	APP	BPCDT	-19991028ACG
04	WDKY-DT	DANVILLE KY	350.7	PLN	DTVPLN	-DTV0012
04	WUNC-TV	CHAPEL HILL NC	322.3	LIC	BLET	-19950809KE
04	WCIV	CHARLESTON SC	361.5	LIC	BLCT	-19860923KG
04	WSMV-TV	NASHVILLE TN	401.6	LIC	BMLCT	-19880822KI
04	WOAY-TV	OAK HILL WV	342.1	LIC	BLCT	-449
04	WGTV-DT	ATHENS GA	202.4	APP	USERRECORD-01	

Total scenarios = 2

Result key: 14
 Scenario 1 Affected station 8

Table 1
INTERFERENCE ANALYSIS RESULTS FOR REVISED COUNTERPROPOSAL
 (page 2 of 2)

Before Analysis

Results for: 4N SC GREENVILLE	BLCT	2363	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	2196954	49309.5	
not affected by terrain losses	2065384	45210.7	
lost to NTSC IX	286342	5618.8	
lost to additional IX by ATV	0	0.0	
lost to all IX	286342	5618.8	

Potential Interferring Stations Included in above Scenario 1

3N NC CHARLOTTE	BLCT	19980227KI	LIC
4N NC CHAPEL HILL	BLET	19950809KE	LIC
4N SC CHARLESTON	BLCT	19860923KG	LIC
4N WV OAK HILL	BLCT	449	LIC

After Analysis

Results for: 4N SC GREENVILLE	BLCT	2363	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	2196954	49309.5	
not affected by terrain losses	2065384	45210.7	
lost to NTSC IX	286342	5618.8	
lost to additional IX by ATV	45960	2177.7	
lost to all IX	332302	7796.5	

Potential Interferring Stations Included in above Scenario 1

3N NC CHARLOTTE	BLCT	19980227KI	LIC
4N NC CHAPEL HILL	BLET	19950809KE	LIC
4N SC CHARLESTON	BLCT	19860923KG	LIC
4N WV OAK HILL	BLCT	449	LIC
4A GA ATHENS	USERRECORD01		APP

The following station failed the de minimis interference criteria.

4D GA ATHENS USERRECORD01
 ERP 17.00 kW HAAT 304.0 m RCAMSL 581.0 m
 Antenna usr WGTV_DT_01

Due to interference to the following station and scenario: 1

4N SC GREENVILLE BLCT 2363
 ERP 100.00 kW HAAT 610.0 m RCAMSL 1199.0 m
 Antenna none

Percent new DTV interference without proposal:	0.0	BLCT	2363
Percent new DTV interference with proposal:	2.1	BLCT	2363

FIGURE 1
GPTC REVISED COUNTERPROPOSAL
OET BULLETIN 69
PREDICTED COVERAGE AND INTERFERENCE
DTV Ch. 4 17 kW 304 m




prepared May 2001 for
Gannett Georgia, L.P.

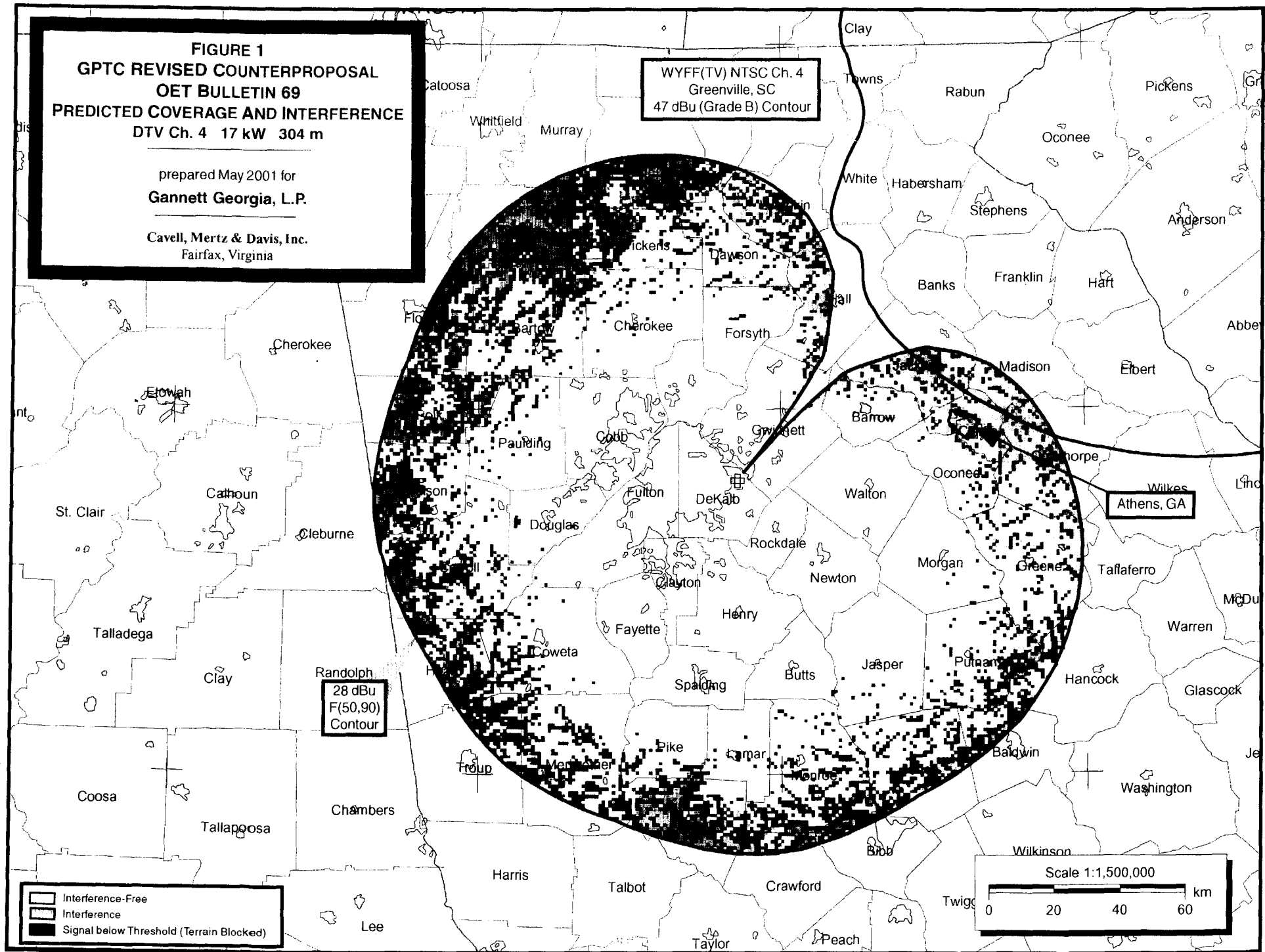
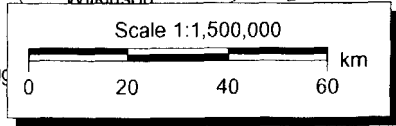
Cavell, Mertz & Davis, Inc.
 Fairfax, Virginia

WYFF(TV) NTSC Ch. 4
 Greenville, SC
 47 dBu (Grade B) Contour

Randolph
 28 dBu
 F(50,90)
 Contour

Wilkes
Athens, GA

-  Interference-Free
-  Interference
-  Signal below Threshold (Terrain Blocked)



CERTIFICATE OF SERVICE

I, Eve J. Klindera, do hereby certify that I have this 7th day of May, 2001, caused to be delivered by first class United States mail, postage prepaid, the foregoing **OPPOSITION TO MOTION TO ACCEPT LATE-FILED REPLY COMMENTS** to the following parties:

Amy E. Weissman, Esq.
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Eve J. Klindera